

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

NURIAN STEFFANY CRUZ-LOVATO
Plaintiff

vs.

UNITED STATES CITIZENSHIP
AND IMMIGRATION SERVICES
Défendants

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Civil Action No.

PLAINTIFFS ORIGINAL COMPLAINT

Parties

Plaintiff, NURIAN STEFFANY CRUZ-LOVATO, an individual who is a citizen of the State of Texas and resides at 21323 Victoria Harbor, Katy, Texas 77449. Defendant, UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES is a governmental agency and has an office located at 126 Northpoint Drive, Suite 2020, Houston, Texas 77060, and may be served with process at that address.

B. Jurisdiction and Venue

The grounds upon which Plaintiff invoke jurisdiction of this Court falls under 28 U.S.C.A. Section 1331 et seq. and because this is an action brought by Plaintiff, who is a resident of this state, Texas and Defendant, UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES with its principal office in Washington, D. C. Plaintiff has instituted her cause of action which arises under the Constitution, laws, or treaties of the United States.

C. Facts

On or about April 13, 2017, Plaintiff, filed her Form I-589, Application for Asylum and for Withholding of Removal.

On or about November 06, 2016, Plaintiffs case was set for Individual Hearing with the Immigration Court located at 1801 Smith St, Houston, Texas 77002 before Immigration Judge. Following the hearing the Immigration Judge issued an Order denying Plaintiffs Form I-589, Application for Asylum and for Withholding of Removal.

On or about December 09, 2019, Plaintiff filed her Appeal of The Immigration Judges Ruling with The Board of Immigration Appeals.

On May 21, 2024, The Board of Immigration Appeal issued its decision which denied Plaintiffs appeal.

**ABUSE OF DISCRETION AND VIOLATION OF IMMIGRATION RULES, LAWS AND
POLICIES**

It is Plaintiffs position that the decision by the board of Immigration Appeals is contrary to the Immigration laws, rules and policies. Further, the same clearly constitutes and abuse of discretion and should be reversed.

E. Prayer

Wherefore premises considered, Plaintiffs request that this honorable Court grant the following:

- a. Issue and order to reverse the decision made by The Board of Immigration Appeals.
- b. Grant Plaintiff the opportunity to proceed with her Form I-589, Application for Asylum and for Withholding of Removal.
- c. Award Plaintiff her attorney fees and costs incurred by her in this case.
- d. Grant any other relief it deems necessary, and appropriate in these circumstances.

Respectfully Submitted,
LAW OFFICES OF JUSTICE B. ADJEI, ESQUIRE
For the Firm

A handwritten signature in blue ink, appearing to read "Justice B. Adjei", is written over a horizontal line.

Justice B. Adjei
Texas Bar No. 00788994
Federal Bar No. 182721
Oklahoma Bar No. 13233
8700 Long Point Rd., Suite 110
Houston, Texas 77055
(713) 237-0338 telephone
(713) 225-5414 facsimile
justice.adjei@lawofficeofjustice.com
Attorney for Plaintiff

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VERIFICATION

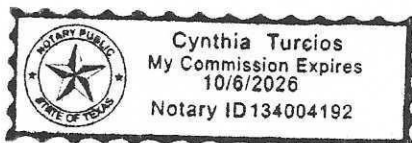
STATE OF TEXAS))
COUNTY OF HARRIS))

The undersigned states under oath: "I am the Plaintiff in the foregoing Original Complaint. I have personal knowledge of the facts and allegations stated therein and they are true and correct to the best of my knowledge and belief".



NURIAN STEFFANY CRUZ-LOVATO

This instrument was acknowledged before me on the 19th day of June, 2024.


NOTARY PUBLIC of TEXAS